

December 6, 2004

Wanda Johnson, WV Program Manager
US EPA, Region III, (3WP22)
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Response to Questions from GWUDI Status Report

Dear Ms Johnson:

Thank you for your comments and questions. Please regard the following:

1. Please refer to your GWUDI Summary dated June 9, 2004, and explain the drop in numbers for each line item of the GWUDI summary dated September 30, 2004.
 - a. Three (3) community systems became inactive during this time. In most cases these systems connect to another community PWS. In one (1) instance a mobile home park dropped below fifteen (15) hookups and 25 people and was removed from the inventory.
 - b. Non-Transient Non-Community, (NTNC) – SDWIS shows that three (3) have closed; four (4) have no explanation; and five (5) have connected to other systems.
 - c. Transient Non-Community (TNC) SDWIS shows five (5) have been connected to other PWSSs and 16 have closed. Some of these will be sold and reopened.
2. What type of systems are you referring to in line item “Other?” Submit all relevant information about these systems.
 - a. “Other” is a category for systems that do not fit into another category. There are three (3) community systems listed. One chlorinator in the well and the risk posed by not chlorinating to get a GWUDI sample seems too high. The other two are scheduled to be connected to other systems and are not expected to complete testing. There are four (4) NTC systems listed: two (2) expect to connect to another PSCS; one (1) is currently a purchase system pending completion of their own well and one (1) chlorinates in the well.
3. Are your “Inactive” systems reflected in the GWUDI summary? If so, where and if not, please include or give a statement as to why they are not included.
 - a. No. They are not. Inactive systems basically do not exist. Some connect to other systems; some close. Many have been classified. Some are even destroyed (e.g. flood, fire).

4. Please elaborate on “measures” the Bureau is taking to ensure compliance with unresponsive systems and state if EPA assistance could be useful.
 - a. Most frequently these “measures” include someone from the Charleston (Central) Office contacting the system via telephone and/or correspondence. The Bureau has considered giving systems a reasonable time to test and declare the system/source GWUDI if they do not test, but this has not been implemented. There is also the possibility that the Bureau could work with county officials to not renew other licenses to entities that have not tested their water per state requirements. Administrative Orders have been used in a few situations.
5. If possible, can you comment on the number of systems that have been taken over by PWS expansions? Is this a reason for the drop in number of “Total Systems Active/Seasonal?”
 - a. Please see the response to question #1. This is most relevant for community systems, less so for Non-Community systems.

We hope have these responses fully addresses your questions. Do not hesitate to contact me via telephone (304-558-6713) or e-mail if you require additional information.

Sincerely,

J. Scott Rodeheaver, Assistant Manager
Source Water Assessment and Protection

JSR/cjj

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